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9 ERIC JAMES TINGEY, and DECOR A DOOR &
10 WINDOW, INC.

11 UNITED STATES DISTRICT COURT
12 SOUTHERN DISTRICT OF CALIFORNIA

13 MASTERPIECE LEADED WINDOWS)
14 CORPORATION,)

15 Plaintiff,

16 vs.

17 SONNY J. JOSLIN, an individual,
18 ERIC JAMES TINGEY, an individual,
19 DECOR A DOOR & WINDOW, INC.,)

20 Defendants.)

Case No. 08 CV 765 JM/JMA

**JOINT PROPOSED DISCOVERY
PLAN**

21 Plaintiff MASTERPIECE LEADED WINDOWS CORPORATION and
22 Defendants SONNY J. JOSLIN ("Joslin"), ERIC JAMES TINGEY ("Tingey"), and
23 DÉCOR A DOOR & WINDOW, INC. ("Décor"), hereby provide their Joint
24 Discovery Plan.

DISCOVERY PLAN

25 Pursuant to Fed. R. Civ. P. 26(f), Plaintiff's counsel, Gastone Bebi, and
26 Defendants' counsel, Chandra Moore, met and conferred regarding the discovery
27 plan in this matter. Counsel discussed the nature and basis of their respective claims
28 and defenses and the possibility of a prompt settlement or resolution of this case.
Counsel further agreed on, and propose to the Court, the following discovery plan.

1 1. The parties have agreed that discovery will be needed on the following
2 subjects:

3 a. Whether the Defendants engaged in Unfair Business Practices, Violated
4 the Lanham Act, Falsely Described its Product, Misappropriated Trade Secrets, and
5 Interfered with Plaintiff's Prospective Economic Advantage;

6 b. Whether and to what extent the alleged conduct resulted in Plaintiff's
7 alleged injuries;

8 c. The present value of Plaintiff's alleged economic and non-economic
9 damages;

10 d. Whether and to what extent Plaintiff has future damages;

11 e. Whether and to what extent Plaintiff mitigated its alleged damages; and

12 f. The existence, extent and nature of offsets against Plaintiff's alleged
13 damages.

14 2. The discovery shall include interrogatories, requests for production and
15 inspection of documents, and requests for admissions. Additionally, the parties
16 presently anticipate deposing Sonny Joslin, Eric Tingey, Joel Debus, William
17 O'Conner and any other witnesses knowledgeable of the items listed in paragraph 1
18 above, and the expert witnesses designated in this matter.

19 3. All discovery shall commence in time to be completed by April 30,
20 2009.

21 4. The length and maximum number of depositions and other discovery
22 shall be governed by the Court's local rules and the Federal Rules of Civil
23 Procedure.

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1 5. The parties reserve their right to conduct additional discovery that may
2 be required, including but not limited to interrogatories, further document demands,
3 depositions not specifically identified herein, and expert witness discovery.

4
5 Dated: September 11, 2008

HAIGHT, BROWN & BONESTEEL, L.L.P.

6
7 By: 

Morton G. Rosen
Chandra Moore
Attorneys for Defendants
SONNY J. JOSLIN, ERIC JAMES
TINGEY, and DECOR A DOOR &
WINDOW, INC.

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11 Dated: September 11 2008

LAW OFFICES OF GASTONE BEBI

12
13 By: 

Gastone Bebi
Attorneys for Plaintiff
MASTERPIECE LEADED
WINDOWS CORPORATION

PROOF OF SERVICE

STATE OF CALIFORNIA }
COUNTY OF LOS ANGELES } ss:

MASTERPIECE LEADED WINDOWS CORPORATION vs. SONNY J. JOSLIN
08 CV 765 JM/JMA

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 550 West C Street, Suite 1760, San Diego, CA 92101.

On September 11, 2008, I served the within document described as:

JOINT PROPOSED DISCOVERY PLAN

on the interested parties in this action as stated below:

Gastone Bebi, Esq.
444 West "C" Street, Suite 400
San Diego, CA 92101

Tel: (619) 374-0514
Fax: (619) 374-1985

☒ (BY ELECTRONIC SERVICE) through the Case Management/Electronic Court Filing system of the United States District Court, Southern District of California.

Executed on September 11, 2008, at San Diego, California.

I declare under penalty of perjury that I am employed in the office of a member of the bar of this Court at whose direction the service was made and that the foregoing is true and correct.

Linda Gage Pomerinke
(Type or print name)

Linda Gage Pomerinke
(Signature)